

JUN 14 2011
1009183
CH 928-
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RACHEL YOUNGER, Individually and as
Administrator of the Estate of NATHANIEL
YOUNGER,

Plaintiff,

- against -

ZURICH AMERICAN INSURANCE COMPANY
and UBS FINANCIAL SERVICES, INC.

Defendants.

Case No. 11 Civ. 1173

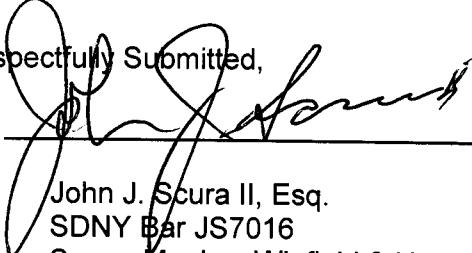
**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I John J. Scura II, Esq., a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice
of :

Christopher Heyer, Esq.
Scura, Mealey, Wigfield & Heyer, LLP
1599 Hamburg Turnpike
Wayne, New Jersey 07470
Tel. (973) 696-8391
Fax. (973) 696-8571

Christopher Heyer is a member in good standing of the Bar of the States of New York and New
Jersey. There are no pending disciplinary proceedings against Christopher Heyer, Esq.

Dated: June 9, 2011
Wayne, New Jersey

Respectfully Submitted,
By: 

John J. Scura II, Esq.
SDNY Bar JS7016
Scura, Mealey, Wigfield & Heyer, LLP
1599 Hamburg Turnpike
Wayne, New Jersey 07470
Tel. (973) 696-8391
Fax. (973) 696-8571

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RACHEL YOUNGER, Individually and as
Administrator of the Estate of NATHANIEL
YOUNGER,

Plaintiff,

- against -

ZURICH AMERICAN INSURANCE COMPANY
and UBS FINANCIAL SERVICES, INC.

Defendants.

Case No. 11 Civ. 1173

**AFFIDAVIT OF JOHN J. SCURA II, ESQ. IN
SUPPORT OF MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New Jersey)
) ss:
County of Passaic)

John J. Scura II, Esq., being duly sworn, hereby deposes and says as follows:

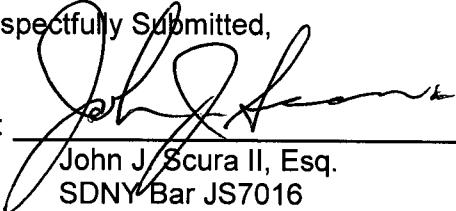
1. I am a member of the law firm of Scura, Mealey, Wigfield & Heyer, LLP, counsel for Defendant UBS Financial Services, Inc. in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant UBS Financial Services, Inc.'s motion to admit Christopher Heyer, Esq. as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in 1991. I am also admitted to the bar of the State of New Jersey, the United States District Court for the District of New Jersey, and am in good standing with this Court.
3. I have known Christopher Heyer, Esq. since January 2001.
4. Mr. Heyer is a member of the law firm of Scura, Mealey, Wigfield & Heyer, LLP.
5. I have found Mr. Heyer to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of procedure.
6. Accordingly, I am pleased to move for the admission of Christopher Heyer, Esq. pro hac vice.
7. I respectfully submit a proposed Order granting the admission of Christopher Heyer, Esq., pro hac vice, which is annexed hereto as Exhibit "A".

WHEREFORE, it is respectfully requested that the motion to admit Christopher Heyer, Esq., pro hac vice, to represent Defendant UBS Financial Services, Inc. in the above captioned matter be granted.

Dated: June 9, 2011
Wayne, New Jersey

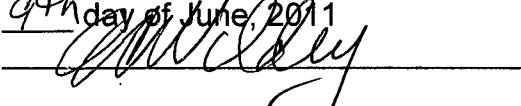
Respectfully Submitted,

By:


John J. Scura II, Esq.
SDNY Bar JS7016

Dated: June __, 2011

Sworn to before me this
9th day of June, 2011


Eileen C. Wildey
A Notary Public of New Jersey
My Commission Expires 12/16/2014

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RACHEL YOUNGER, Individually and as
Administrator of the Estate of NATHANIEL
YOUNGER,

Plaintiff,

- against -

ZURICH AMERICAN INSURANCE COMPANY,
and UBS FINANCIAL SERVICES, INC.

Defendants.

Case No. 11 Civ. 1173

**ORDER FOR ADMISSION
PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of John J. Scura II, Esq., attorney for Defendant UBS Financial

Services, Inc. and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Christopher Heyer, Esq.
Scura, Mealey, Wigfield & Heyer, LLP
1599 Hamburg Turnpike
Wayne, New Jersey 07470
Tel. (973) 696-8391
Fax (973) 696-8571
E-mail cheyer@scuramealey.com

is admitted to practice pro hac vice as counsel for Defendant UBS Financial Services, Inc. in
the above captioned case in the United States District Court for the Southern District of New
York. All attorneys appearing before this Court are subject to the Local Rules of this Court,
including the Rules governing discipline of attorneys. If this action is assigned to the Electronic
Case Filing (ECF) system, counsel shall immediately apply for an EFC password at
nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: June 9, 2011
New York, New York

United States District/Magistrate Judge

Supreme Court of New Jersey

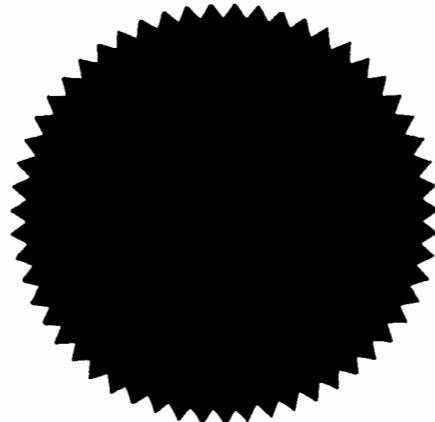


Certificate of Good Standing

This is to certify that **CHRISTOPHER HEYER**
(No. **015531990**) was constituted and appointed an Attorney at Law of New Jersey on **December 20, 1990** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this
26TH day of May , 20 11 .

A handwritten signature in black ink, appearing to read "Mark T. Hause".
Clerk of the Supreme Court



*State of New York
Supreme Court, Appellate Division
Third Judicial Department*

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Christopher Heyer

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 22nd day of January, 1991, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

*In Witness Whereof, I have hereunto set my hand
and affixed the Seal of said Court, at the
City of Albany, this 23rd day of May,
2011.*



Robert D. Mayberger
Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RACHEL YOUNGER, Individually and as
Administrator of the Estate of NATHANIEL
YOUNGER,

Plaintiff,

- against -

ZURICH AMERICAN INSURANCE COMPANY
and UBS FINANCIAL SERVICES, INC.

Case No. 11 Civ. 1173

CERTIFICATION OF SERVICE

Defendants.

I, Christopher Heyer, Esq., of full age, certify that:

1. I am a member of the law firm of Scura, Mealey, Wigfield & Heyer, LLP, counsel for Defendant UBS Financial Services, Inc. in the above captioned action.
2. On June 9, 2011, I served via Regular Mail First Class an original and two (2) copies of Defendant UBS Financial Services, Inc.'s Motion to Admit Counsel Pro Hac Vice, Order for Admission Pro Hac Vice on Written Submission and the Affidavit of John J. Scura II, Esq. in Support of Motion to Admit Counsel Pro Hac Vice to Admissions Clerk of the United States District Court for the Southern District of New York, 500 Pearl Street New York, New York 10007-1312. On same date I sent via electronically a copy of said papers to the following:

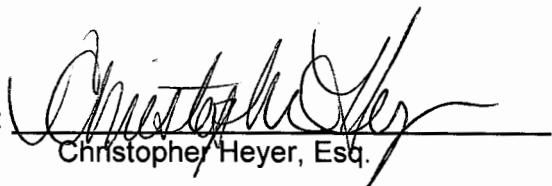
Cye E. Ross, Esq.
30 Vesey Street, Suite 1800
New York, New York 10007
Attorney for Plaintiff

Andrew I. Hamelsky, Esq.
White and Williams LLP
One Penn Plaza
41st Floor, Suite 4110
New York, New York 10119
Attorney for Defendant Zurich American Insurance Company

Steven S. Fitzgerald, Esq.
Wollmuth Maher & Deutsch, LLP
500 Fifth Avenue
New York, New York 10110
Attorney for Defendant Zurich Life Insurance Company

Honorable Thomas P. Griesa, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 26B
New York, New York 10007-1312.

I hereby certify that the foregoing statements made by me are true. I am aware that if any such statements are willfully false, I am subject to punishment.

By: 
Christopher Heyer, Esq.